

EXHIBIT A

From: Michael Grenert <mgrenert@grenertlaw.com>
Sent: Wednesday, November 15, 2023 9:40 AM
To: Moore, Paxton; Smith, Ivan D.; Stamp, Maureen M.; Moreno, Jeniffer A.
Cc: Paparella Andrea
Subject: Ward v. Cohen - Plaintiff's Subpoenas Duces Tecum
Attachments: 2023-11-15 Subpoena Duces Tecum to Charles S. Cohen.pdf; 2023-11-15 Subpoena Duces Tecum to Steven Cherniak.pdf; 2023-11-15 Subpoena Duces Tecum to Marc Horowitz.pdf; 2023-11-15 Subpoena Duces Tecum to David Fogel.pdf; 2023-11-15 Subpoena Duces Tecum to Stephen Fredericks.pdf

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Attached are subpoenas for documents from Charles S. Cohen, Steven Cherniak, Marc Horowitz, David Fogel, and Stephen Fredericks. Plaintiff requested these documents from these individuals, including from their personal cell phones, in their document requests to Defendants. We believe that Defendants sufficiently control these senior executives to produce texts from their personal cell phones that relate to business rather than personal matters, and in Mr. Cohen's case he owns the company. But in anticipation that Defendants will object that they do not control these individuals' personal cell phones, we are serving these subpoenas.

Please let us know by Friday whether you will accept service of these subpoenas on behalf of these individuals. Otherwise we will send process servers to serve them directly on these individuals.

Michael E. Grenert
Law Office of Michael Grenert, PLLC
372 15th St., #2A
Brooklyn, New York 11215-5695
Phone: (917) 553-2050
Fax: (917) 725-8525
Email: mgrenert@grenertlaw.com
Website: <http://www.grenertlaw.com/> [[grenertlaw.com](http://www.grenertlaw.com/)]
Social Media: <http://www.linkedin.com/in/michaelgrenert>
(Admitted to practice law in New York and New Jersey)

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